

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Michael J. Wang, M.D.

Plaintiff,

-Against-

United States Medical License
Examination Secretariat,

Defendant,
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FILED
IN CLERK'S OFFICE
U S DISTRICT COURT E.D.N.Y.

★ MAY 13 2005 ★

LONG ISLAND OFFICE
CV 05-1861
(JS) (ARL)

PLAINTIFF PROPOSED JURY INSTRUCTIONS

The jury in this case will be asked to combine all the evidence in consideration of the law as it comes from the Court and reach a reasonable, truthful, and proper verdict as to the guilt or innocence the defendants on trial. In addition to all the considerations of fairness and objective judgment which the jury is asked to render.

In deciding what the facts are, you may have to decide what testimony you believe and what testimony you do not believe. You may believe all of what a witness said, or only part of it, or none of it.

In deciding what testimony to believe consider the witness's intelligence, the opportunity the witness had to have seen or heard the things testified about.

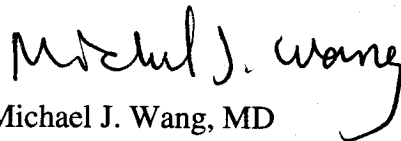
In deciding whether or not to believe a witness, keep in mind that people sometime hear or see things differently and sometime forget things. You need to considerer therefore whether a contradiction is an innocent misrecollection or lapse of memory or an intentional falsehood, and that may depend on whether it has to do with an important fact or only a small detail.

You may use reason and common sense to draw deductions or conclusions from facts which have been established by the evidence in this case. It is your duty to find that facts from all the evidence in this case to the facts as you find them and apply the laws.

Dated: May 11, 2005

cc. Michael J. Puma Esq.
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Respectfully submitted


Michael J. Wang, MD